

MEDIA MANAGEMENT INC.



"Setting The Standard For Media Accountability"®

Received & Inspected

SEP 24 2008

FCC Mail Room

September 23, 2008

08-187

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, Maryland 20743  
Attn: Audio Division  
Media Bureau

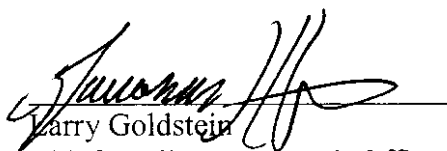
Re: Comments In Opposition to Emergency Petition for Section 403

Dear Secretary Dortch:

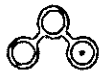
We understand that the FCC is considering intervention in the rollout of Arbitron's Portable People Meter (PPM) radio audience measurement service. We believe that electronic measurement of radio audiences is long overdue and that PPM offers a much-needed improvement over past reliance on recall-based pencil and paper diaries. Further, more accurate and continuous (timely) measurement of radio audiences will aid stations in delivering a higher level of accountability to the advertisers we service, reassuring them that they will achieve the ultimate return on investment promised for their radio investments. Radio is not alone in this endeavor – television has long moved to electronic people meters and outdoor and print as beginning to implement and/or explore similar capabilities. To intervene and delay these improvements will further disadvantage radio at a time when it can ill afford it.

Congress has sanctioned the Media Rating Council and its mission to accredit currency audience measurement services to assure they meet the minimum standards set out by the council and work tirelessly to address the improvement agenda they have established for Arbitron and other research companies. We believe the MRC brings the requisite expertise to continue this process as it has over the past few years. The FCC is not expert in the science of audience measurement and it would be a disservice to the industry to impose a formal investigation into PPM methodology at a time when Arbitron is working closely and productively with the Media Rating Council to refine its service.

Sincerely yours,

  
Larry Goldstein  
Chief Media & Research Officer  
Media Management, Inc.

No. of Copies rec'd 0  
List ABCDE



allscopeMEDIA

*Audio Series*  
D.V.

Received & Inspected

SEP 25 2008

FCC Mail Room

September 23, 2008

MB DOCKET NO. 08-187

*08-187*

Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

To Whom It may Concern,

I am writing to voice my support the new PPM system being implemented by Arbitron. While the system is not without its problems, it is far better than the system we are currently using. The current Diary System has been around, unchanged, since 1965. It is based on recall and has a lag time of over 6 months. It is time to step into the 21<sup>st</sup> century and the age of electronics.

It is imperative for advertiser, as well as stations, to have a measurement system that is more accurate and timelier than this. The PPM will allow radio to obtain what Broadcast Television and Internet advertising has - accountability that is timely and accurate.

I strongly believe that the PPM system shows a more realistic view of a market place and station's listenership. While the PPM still has its bugs to work out (sample size, retention, ect.), much like television did when they first introduced electronic measurement, it is long past time to get the product out into the market place. Arbitron takes the Radio community's concerns seriously and listens to them. The release of the New York PPM was already delayed a year in order to address the concerns of minority-owned and minority-oriented broadcasters. The current petition to delay the PPM's release again will only harm the radio industry as a whole.

Radio needs to stay competitive with all the other options that advertisers have in today's market place - without an electronic system they will fall behind and everyone will lose out. Please don't delay the PPM any further.

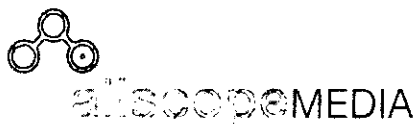
Cordially,

Karen Klein  
Broadcast Manager  
Allscope Media

Cc:

ALLSCOPE MEDIA  
230 west 41 street, 20f  
new york, ny 10036  
m: 212.253.1300  
f: 212.253.1625  
allscope.com

RECEIVED  
2008 OCT 10 P 3:19  
FEDERAL COMMUNICATIONS DIVISION  
No. of Copies rec'd 0  
List ABCDE



Received & Inspected

SEP 25 2008

FCC Mail Room

September 23, 2008

08-187

MB DOCKET NO. 08-187

Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

To Whom It may Concern,

I am writing to voice my support the new PPM system being implemented by Arbitron. While the system is not without its problems, it is far better than the system we are currently using. The current Diary System has been around, unchanged, since 1965. It is based on recall and has a lag time of over 6 months. It is time to step into the 21<sup>st</sup> century and the age of electronics.

It is imperative for advertiser, as well as stations, to have a measurement system that is more accurate and timelier than this. The PPM will allow radio to obtain what Broadcast Television and Internet advertising has – accountability that is timely and accurate.

I strongly believe that the PPM system shows a more realistic view of a market place and station's listenership. While the PPM still has its bugs to work out (sample size, retention, ect.), much like television did when they first introduced electronic measurement, it is long past time to get the product out into the market place. Arbitron takes the Radio community's concerns seriously and listens to them. The release of the New York PPM was already delayed a year in order to address the concerns of minority-owned and minority-oriented broadcasters. The current petition to delay the PPM's release again will only harm the radio industry as a whole.

Radio needs to stay competitive with all the other options that advertisers have in today's market place – without an electronic system they will fall behind and everyone will lose out. Please don't delay the PPM any further.

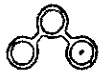
Cordially,

Karen Klein  
Broadcast Manager  
Allscope Media

Cc:

ALLSCOPE MEDIA  
230 west 41 street, 20fl  
new york, ny 10036  
m: 212.253.1300  
f: 212.253.1625  
www.allscope.com

No. of Copies rec'd 0  
List ABCDE



ALLSCOPE MEDIA

Received & Inspected

SEP 25 2008

FCC Mail Room

September 23, 2008

08-187

MB DOCKET NO. 08-187

Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

To Whom It may Concern,

I am writing to voice my support the new PPM system being implemented by Arbitron. While the system is not without its problems, it is far better than the system we are currently using. The current Diary System has been around, unchanged, since 1965. It is based on recall and has a lag time of over 6 months. It is time to step into the 21<sup>st</sup> century and the age of electronics.

It is imperative for advertiser, as well as stations, to have a measurement system that is more accurate and timelier than this. The PPM will allow radio to obtain what Broadcast Television and Internet advertising has – accountability that is timely and accurate.

I strongly believe that the PPM system shows a more realistic view of a market place and station's listenership. While the PPM still has its bugs to work out (sample size, retention, ect.), much like television did when they first introduced electronic measurement, it is long past time to get the product out into the market place. Arbitron takes the Radio community's concerns seriously and listens to them. The release of the New York PPM was already delayed a year in order to address the concerns of minority-owned and minority-oriented broadcasters. The current petition to delay the PPM's release again will only harm the radio industry as a whole.

Radio needs to stay competitive with all the other options that advertisers have in today's market place – without an electronic system they will fall behind and everyone will lose out. Please don't delay the PPM any further.

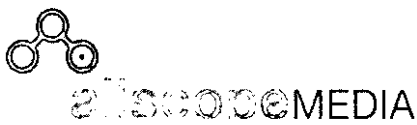
Cordially,

Karen Klein  
Broadcast Manager  
Allscope Media

Cc:

ALLSCOPE MEDIA  
230 west 41 street, 20th  
new york, ny 10036  
m: 212.253.1300  
f: 212.253.1625  
www.allscope.com

No. of Copies rec'd 0  
List ABCDE



Received & Inspected

SEP 25 2008

FCC Mail Room

September 23, 2008

MB DOCKET NO. 08-187

08-187

Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

To Whom It may Concern,

I am writing to voice my support the new PPM system being implemented by Arbitron. While the system is not without its problems, it is far better than the system we are currently using. The current Diary System has been around, unchanged, since 1965. It is based on recall and has a lag time of over 6 months. It is time to step into the 21<sup>st</sup> century and the age of electronics.

It is imperative for advertiser, as well as stations, to have a measurement system that is more accurate and timelier than this. The PPM will allow radio to obtain what Broadcast Television and Internet advertising has – accountability that is timely and accurate.

I strongly believe that the PPM system shows a more realistic view of a market place and station's listenership. While the PPM still has its bugs to work out (sample size, retention, ect.), much like television did when they first introduced electronic measurement, it is long past time to get the product out into the market place. Arbitron takes the Radio community's concerns seriously and listens to them. The release of the New York PPM was already delayed a year in order to address the concerns of minority-owned and minority-oriented broadcasters. The current petition to delay the PPM's release again will only harm the radio industry as a whole.

Radio needs to stay competitive with all the other options that advertisers have in today's market place – without an electronic system they will fall behind and everyone will lose out. Please don't delay the PPM any further.

Cordially,

Karen Klein  
Broadcast Manager  
Allscope Media

Cc:

ALLSCOPE MEDIA  
230 west 41 street, 20th  
new york, ny 10036  
m: 212.253.1300  
f: 212.253.1625

No. of Copies rec'd 0  
List ABCDE